

DATA PROTECTION & PRIVACY NOTICE

The Rakuten International reporting portal and hotline (“**Hotline**”) is a web and phone-based intake system provided by Rakuten USA, Inc. dba Rakuten International, headquartered at 800 Concar Drive, San Mateo, CA 94402 (“**Rakuten International**”) to its and Rakuten International companies’ employees, vendors, suppliers, and business partners (“**Reporters**”) for reporting suspected violations of laws or regulations, or for certain matters expressly specified in an applicable whistleblowing law. In certain countries, such as the United States, the Hotline may also be used to report suspected violations of other matters such as Company policies.

1. Controller

In accordance with applicable data protection regulations, the following entities will be considered the controllers of your personal data processed in relation to the Hotline, as follows:

- The Rakuten International company which holds the employment, commercial, or professional relationship with the person filing the report or the person reported about, is the controller of the personal data for the purposes of investigating and resolving the actions or behaviors reported, especially in criminal and regulatory compliance matters, as well as managing inquiries, doubts, and/or improvement proposals to any existing local reporting systems.
- Rakuten International is the controller of the personal data processing for the purpose of providing a single Hotline portal to Rakuten International Reporters, for the intake and assignment of the report to the authorized person in charge of Whistleblowing compliance in each corresponding Rakuten International entity, as well as for the management of the information system and any related inquiries, doubts and/or improvements to the Hotline reporting system.

The Hotline and the database in which the personal data and information that you may report is stored, are operated in the United States by NAVEX, which is a processor acting on behalf of Rakuten International.

You may contact Rakuten International Compliance team with general questions relating to this Hotline service as follows: am-compliance@mail.rakuten.com

You may contact Rakuten International Regional Privacy team with any questions relating to this Privacy Notice or any requests relating to the use, transfer, correction, or deletion of any of your personal data stored by this Hotline service at: amrhqprivacy@mail.rakuten.com, in addition to the contact points established in the corresponding Rakuten International company’s policies.

2. Use of the Hotline

Use of the Hotline is entirely voluntary. You are encouraged to report possible violations directly to your supervisor or manager, or to a representative of the Human Resources, Legal or Corporate Compliance Departments, depending on the nature of the possible violation. If you feel that you are unable to do so, you may use the Hotline to make your report.

The Hotline is a confidential online reporting system that allows you to report concerns or suspected violations of law or company policies to Rakuten International. In certain countries, including throughout much of the European Union (EU) and surrounding areas, reporting topics may be limited pursuant to applicable law. Further, some countries restrict reporting such that only employees in key or management functions may be the subject of a report. In such cases, Rakuten International may only accept reports through the Hotline that relate to certain issue types expressly specified in an applicable whistleblowing law or regarding certain types of employees. If your concern pertains to a matter that, under local law, may not be accepted by Rakuten

International through the Hotline, you will need to contact your supervisor or local management or a representative of the Human Resources, Legal or Corporate Compliance Departments to report the matter.

Please be aware that the information you supply about yourself, your colleagues or other individuals, or any aspect of the company's operations may result in decisions or actions that affect others. Therefore, we ask that you only provide information that you believe is true. You will not be subject to retaliation from Rakuten International for any report of a suspected violation that is made in good faith, even if it later turns out to be factually incorrect. Please be aware, however, that knowingly providing false or misleading information will not be tolerated. The information you submit will be treated confidentially, except to the extent that this is not possible because of legal requirements or in cases where required in order to conduct an investigation, in which case the information will be handled sensitively. Generally, we encourage you to identify yourself in order for us to follow up with questions we may have. In many locations you will have the opportunity to submit your report anonymously if you so choose, but in some countries, anonymous reports may not be permitted under the law except under extremely restrictive circumstances.

3. What personal data and information is collected and processed?

The Hotline captures the following personal data and information that you provide when you make a report:

- (i) your name and contact details (unless you report anonymously), the relevant Rakuten International company and location of the incident or issue you are reporting;
- (ii) the name and other personal data of the persons you name in your report, if you provide such information (e.g.; description of role, functions, etc.); and
- (iii) a description of the alleged misconduct or violation as well as a description of the circumstances of the incident or issue.

Note that depending upon the laws of the country in which you are residing, the report may not be able to be made anonymously; however, your personal information will be treated confidentially and sensitively and will only be disclosed as set out below.

4. Purposes of Processing and Legal Basis

The applicable Rakuten International company and/or Rakuten International will process your personal data to investigate the issues raised in the report and to take appropriate follow-up action, in accordance with applicable law. The legal bases for this processing will be:

- compliance with its legal obligations
- safeguarding public interests such as criminal investigations or public security and/or to protect the vital interests of persons for certain types of issues

Rakuten International, as Regional Headquarters, will process your personal data only as needed, for its legitimate interest in providing a single point of access for all Reporters, administration of the system, and in coordinating the investigation of reports impacting more than one Rakuten International company.

5. Recipients of Personal Data and Transfers

For the purpose of processing and investigating the report, and subject to the provisions of local law, the personal data and information you provide may be accessed, processed and used by:

- the authorized personnel of Rakuten International or the Rakuten International entity in charge of investigating the report, in accordance with applicable laws and policy, which may include Human Resources, Finance, Internal Audit, Legal, Privacy, Corporate Compliance, and management;
- Other Rakuten entities (besides your employer) or relevant suppliers, vendors, or partner entities, only where reports involve such other entities and only to the limited extent it is necessary for the investigation and potential follow-up actions;
- service providers, such as external advisors (e.g. legal advisors), or, in limited circumstances, by technical staff at NAVEX.
- only in cases where the reported incident leads to administrative, legal, or judicial actions, personal data and information you provide may also be disclosed to the police and/or other enforcement or regulatory authorities, or to authorized parties as required by subpoena or other legal mandate.

Some of these recipients may be located outside the European Economic Area and therefore may not be required by local laws to provide a level of data protection comparable to that of the European Union. In such cases, we transfer the data with appropriate safeguards to require such treatment, such as Rakuten Group's Binding Corporate Rules, which you can consult at <https://global.rakuten.com/corp/privacy/bcr/>, Standard Contractual Clauses, or any other appropriate measure.

Rakuten International will promptly notify any person who is the subject of a report to the Hotline, except where such notice needs to be delayed to ensure the integrity of the investigation and preservation of relevant information. With some exceptions, the subject of the report may access information concerning the report (with the exception of the identity of the Reporter, except where this information may be required by law to be provided).

In the event you make a report regarding a subsidiary of Rakuten Group, Inc. that is not part of Rakuten International, you may be asked to submit your report via the hotline or reporting portal for the appropriate location or business jurisdiction or your report may be transferred to the report-handling team in the APAC or Japan regions of Rakuten Group, Inc., as applicable, which may be located outside the EU, UK, or U.S.

6. Retention of the Report and of Your Data

The report and your personal data will be retained for as long as they are needed for the investigation of the allegations and for any legitimate follow-up to the investigation. Thereafter, they will be retained according to the period required by local law, and then fully and securely destroyed or erased.

7. Your Rights

Rakuten International will fully support you in the exercise of any rights you may have as a data subject under applicable law, including your right to:

- access your data;
- rectify or correct factually incorrect or incomplete data;
- delete or erase your data ("right to be forgotten");
- restrict ("block") our processing of contested data;
- have third parties who received incorrect, incomplete or contested data be informed of any rectifications or blocking of your data;
- port your data in a machine readable format;
- object to our processing under certain circumstances;

We will not use your data or any information in the report for automated decision making or profiling and will not discriminate against you for exercising your privacy rights.

Generally, both the subject of the report and the Reporter may request to access information concerning the report that relates to them, with some exceptions (such as Reporter identity, unless required by law to be disclosed) and may request correction of their factually inaccurate or incomplete personal data contained therein, in accordance with applicable law.

We will only restrict any of the above rights if and to the extent that that is necessary and proportionate in order to comply with legal obligations, safeguard important public interests recognized in applicable law such as the integrity of criminal investigations or protection of public security, or to protect our legal rights or the fundamental rights and freedoms of others, including Reporters and any person(s) accused or incriminated in a report, in accordance with applicable law.

Data subjects may exercise the abovementioned rights at the email addresses indicated in Section 1, above. In addition to the rights listed above, you may also have the right to lodge a complaint about our processing of your personal data with the authority competent for supervising the processing of personal data (often referred to as the data protection authority) in the country or state where you live.